

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

Emergent Fidelity Technologies Ltd,

Debtor.<sup>1</sup>

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)  
) Chapter 11  
)  
) Case No. 23-10149 (JTD)  
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)

**NOTICE OF DEBTOR'S INTENT TO OFFER WITNESS  
TESTIMONY AT THE HEARING ON MARCH 14, 2023**

**PLEASE TAKE NOTICE** that debtor and debtor-in-possession Emergent Fidelity Technologies Ltd. (the “Debtor”) hereby provides the following information regarding the witnesses it intends to present at the hearing scheduled in the above-captioned chapter 11 case on March 14, 2023 (the “Hearing”):

**INFORMATION ON FIRST WITNESS**

1. Name and title of witness: Angela Barkhouse, Joint Provisional Liquidator of the Debtor by appointment of the High Court of Antigua.
2. Scope of testimony: Ms. Barkhouse will testify in opposition to *BlockFi's Motion for Entry of an Order Dismissing the Debtor's Chapter 11 Case* (the “Motion”) [D.I. 32].
3. Direct testimony of witness: Ms. Barkhouse will provide direct testimony concerning the background to the commencement of this chapter 11 case, to the extent necessary or advisable or requested by the Court, upon the Debtor's proffer of her *Declaration of Angela Barkhouse in Support of the Debtor's Chapter 11 Petition* [D.I. 3].
4. Location and place from which the witness will testify: Ms. Barkhouse will be available to testify in person.

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<sup>1</sup> The Debtor in this Chapter 11 case is Emergent Fidelity Technologies Ltd, a company formed under the laws of Antigua and Barbuda with registration number 17532 as identified by the Antigua and Barbuda Financial Services Regulatory Commission. The Debtor's principal place of business is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

**INFORMATION ON SECOND WITNESS**

1. Name and title of witness: John C. Goodchild, III, Partner at Morgan, Lewis & Bockius LLP, proposed counsel to the Debtor.
2. Scope of testimony: Mr. Goodchild will testify in opposition to the Motion.
3. Direct testimony of witness: Mr. Goodchild will provide direct testimony concerning the retainer held by proposed Debtor's counsel, to the extent necessary or advisable or requested by the Court, upon the Debtor's proffer of his Declaration in opposition to the Motion [D.I. 40-1].
4. Location and place from which the witness will testify: Mr. Goodchild will be available to testify in person.

**RESERVATION OF RIGHTS**

The Debtor reserves the right to amend and supplement this witness list at any time prior to the Hearing. Additionally, the Debtor reserves all rights to cross examine any and all witnesses proffered at the Hearing, and to call any rebuttal witnesses as it may deem necessary at the Hearing.

*[Signature page to follow]*

Dated: March 12, 2023  
Wilmington, DE

**MORGAN, LEWIS & BOCKIUS LLP**

/s/ Jody C. Barillare

Jody C. Barillare (Bar No. 5107)  
1201 N. Market Street, Suite 2201  
Wilmington, DE 19801  
Telephone: (302) 574-3000  
Email: jody.barillare@morganlewis.com

- and -

John C. Goodchild, III (admitted *pro hac vice*)  
Matthew C. Ziegler (admitted *pro hac vice*)  
1701 Market Street  
Philadelphia, PA 19103  
Telephone: (215) 963-5000  
Email: john.goodchild@morganlewis.com  
Email: matthew.ziegler@morganlewis.com

- and -

Craig A. Wolfe (admitted *pro hac vice*)  
Joshua Dorchak (admitted *pro hac vice*)  
David K. Shim (admitted *pro hac vice*)  
101 Park Avenue  
New York, NY 10178  
Telephone: (212) 309-6000  
Email: craig.wolfe@morganlewis.com  
Email: joshua.dorchak@morganlewis.com  
Email: david.shim@morganlewis.com

*Proposed Counsel for Emergent Fidelity  
Technologies Ltd as Debtor and Debtor-in-  
Possession*